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Federal Communications Commission  
Office of Secretary

July 15, 2003

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Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: WT Docket No. 94-102  
TTY Quarterly Report 2003  
Nevada Wireless, LLC

Dear Ms. Dortch:

On behalf of Nevada Wireless, LLC ("Nevada Wireless"), this letter is submitted to report the status of the company's implementation of the capability to transmit 911 calls from text telephone ("TTY") devices.

Nevada Wireless, in a consolidated filing with Airtel Wireless, LLC ("Airtel"), submitted a Petition for Waiver and Extension of Digital Wireless E911 TTY Requirements on June 27, 2002 ("Petition"). In the Petition, Nevada Wireless explained that it and Airtel had deployed digital Harmony systems on 800 MHz Specialized Mobile Radio ("SMR") spectrum. The Petition described Harmony as a micro-digital derivative of the iDEN technology used by Nextel Communications, Inc. It explained that the Harmony system was developed by Motorola, Inc. primarily for use in private internal rather than commercial communications systems and is available only at 800 MHz. At the time the Petition was filed, and still today, Nevada Wireless and Airtel are the only commercial operators that have deployed this technology in the United States. It unquestionably is a niche product with limited commercial application in this country.

In the Petition, Nevada Wireless advised the FCC that Motorola characterizes the Harmony network as an integrated, digital wireless system offering the voice communications capabilities of dispatch and telephone interconnect services. Because the product was designed in response to the needs of private, rather than commercial users, it is at its core a dispatch-oriented product with ancillary interconnection capability. The system has significant limitations in the number of sites that can be deployed, the number of subscriber units that can be accommodated, and the number of

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interconnect lines available at any one time. The network design deliberately favors dispatch over interconnect transmissions even if dispatch capacity is available at a particular moment.

These core distinctions between a Harmony system and other networks classified by the FCC as “covered carriers” have presented significant obstacles in meeting certain regulatory requirements. In a letter filing dated August 20, 2002 and supplemented on October 31, 2002, Nevada Wireless explained that it has elected to satisfy its obligations under FCC Rule Sections 20.18 (b) through (e), including subsection (c) relating to TTY access to 911 services, by meeting the requirements of FCC Rule Section 20.18(k). That provision permits service providers such as Nevada Wireless that offer dispatch service to comply with the requirements of subsections (b) through (e) by routing customers’ emergency calls through a dispatcher.<sup>1</sup> In accordance with that rule, Nevada Wireless makes all reasonable efforts to explicitly notify existing and prospective customers that they are not able to reach a PSAP by dialing 911 and that they should instead contact their dispatcher.

Nevada Wireless was the first commercial operator to implement a Harmony system. As such, it has worked with Motorola, Inc., the sole source equipment supplier for Harmony infrastructure, switches and subscriber equipment, to identify and resolve the myriad technical and operational issues that arise in the deployment of a new, niche technology. It currently utilizes the second generation of software releases for this technology (“SSR2”), the most recent release that has been optimized for commercial use. This version utilizes MF or PRI, rather than SS7, for its interface with the telephone network, an interface commonly associated with private internal as opposed to commercial systems. It is not capable of many of the functions needed to support TTY or other E911 requirements that Nevada Wireless would be obligated to meet absent the dispatch option noted above.

However, during the past few months Nevada Wireless has been the beta test for Motorola’s next software release. The SSR3 release has the potential to support TTY capability with the addition of third party hardware and software. Motorola and Nevada Wireless are optimistic that the system will be fully optimized and available for commercial operation sometime during the fourth quarter of this year.

Nevada Wireless is encouraged by the recent advances in the Harmony network capabilities. As these more advanced functions become commercially available, it expects to continue expanding the capabilities it is able to offer its subscribers.

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<sup>1</sup>47 C.F.R. § 20.18(k).

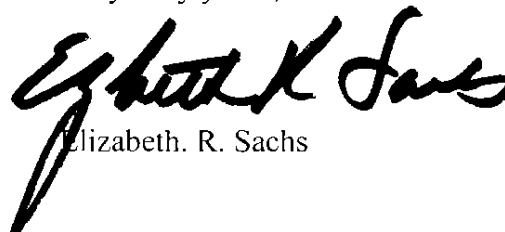
Marlene H. Dortch, Secretary

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Kindly refer any questions or correspondence regarding this matter to the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "Elizabeth R. Sachs". The signature is fluid and cursive, with a large, stylized "E" and "S".

Elizabeth R. Sachs

cc: Judith Boley Herman, Office of Management and Budget, FCC  
Kim Johnson, Office of Management and Budget, FCC  
Blaise Scinto, Acting Chief, Policy Division  
Wireless Telecommunications Bureau, FCC  
K. Dane Snowden, Chief  
Consumer & Governmental Affairs Bureau, FCC  
William Maher, Chief, Wireline Competition Bureau, FCC